

EXHIBIT A:
STIPULATED FACTS

The undersigned parties hereby stipulate and agree that if this case had proceeded to trial, the government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

At all times relevant to this case, defendant **RONALDO MONTEIRO** was a resident of Silver Spring, Maryland. In 2005, Special Agents of the Department of Homeland Security's Immigration and Customs Enforcement were conducting a national operation involving the purchase of membership to websites advertising and offering access to images of children engaged in sexually explicit conduct. While investigating the purchasers of access to a website titled "illegal CP," agents viewed a purchase made by **MONTEIRO** through an email transaction in which the Defendant provided his home address, credit card information and email account, and for \$79.99 obtained a subscription to a restricted website which provided access to images depicting children being sexually abused. Credit card, bank information and email information confirmed **MONTEIRO**'s identify as the purchaser.

On October 10, 2006, agents executed a federal search warrant at **MONTEIRO**'s residence. During the search, agents interviewed **MONTEIRO**, who advised that he purchased access to the website that contained depictions of child pornography. Agents also seized digital media, including three computers.

Forensic analysis of one of **MONTEIRO**'s computer revealed approximately 4,000 images depicting children engaged in sexually explicit conduct. On or about October 10, 2006, in the District of Maryland, **MONTEIRO** possessed the following images, among others:

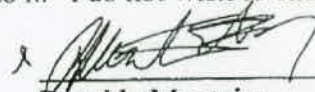

- * an image titled, "_003_.jpg," which depicts a pre-pubescent female, naked from the waist down, being vaginally penetrated by a male penis while simultaneously performing oral sex on a naked pre-pubescent male. The image "-003_.jpg" is an identified series with a known victim;
- * an image titled, "AFB42DDFd01.jpg," which is a collage of four images that depict a pre-pubescent female, nude below the waist, exposing her genitalia to the camera while an adult male's erect penis can be seen in the images;
- * an image titled, "_002_.jpg," which depicts a naked pre-pubescent female lying on her back while an adult male vaginally penetrates her with his penis.

Pursuant to identification by the National Center for Missing and Exploited Children, several images were identified as depicting known victims and therefore depict actual minors

engaged in sexually explicit conduct. These victims did not reside in nor were the images produced in Maryland; the images therefore traveled in interstate and foreign commerce.

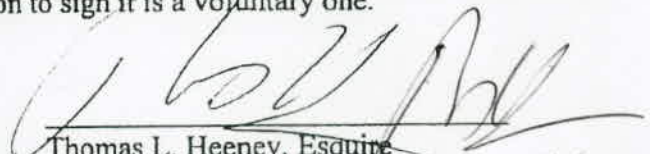
I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

Jan - 6, 2011
Date

  1/12/11
Ronaldo Monteiro

I am Ronaldo Monteiro's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is a voluntary one.

1/6/11
Date


Thomas L. Heeney, Esquire 1/12/11